

EXHIBIT

C

VOL: I
PAGES: 1-118
EXHIBITS: 1-4

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHU.

SHEILA J. PORTER, *
Plaintiff *
-vs- * Civil Action
ANDREA CABRAL; SUFFOLK COUNTY * No. 04-11935-DPW
SHERIFF'S DEPARTMENT; SUFFOLK *
COUNTY and CORRECTIONAL MEDICAL *
SERVICES, INC., *
Defendants *

CONFIDENTIAL PURSUANT TO THE PROTECTIVE ORDER

DEPOSITION OF MARY ELLEN MASTRORILLI, a witness
called on behalf of the Plaintiff, in the
above-captioned matter, said deposition being
taken pursuant to the Federal Rules of
Civil Procedure, before Patricia M.
McLaughlin, a Certified Shorthand Reporter and
Notary Public in and for the Commonwealth of
Massachusetts, at the offices of Goodwin Procter
LLP, Exchange Place, Boston, Massachusetts, on
Monday, June 27, 2005, commencing at 10:05 a.m.

McLAUGHLIN & ASSOCIATES COURT REPORTERS
92 DEVIR STREET, SUITE 304
MALDEN, MASSACHUSETTS 02148
781.321.8922
WWW.E-STENOGRAPHER.COM

1 Q Do you recognize the handwriting?

2 A Yes, I do.

3 Q Whose handwriting is that?

4 A That is mine.

5 Q If you could just read to us what you wrote
6 there.

7 A "Finally received this yesterday, 5/28, M."

8 Q And is the "this" that you are referring to
9 here the two pages that follow?

10 A Yes, it is.

11 Q Who is that note written to?

12 A That's written to Patrick Bradley.

13 Q And did you send then the document that you
14 received from Donna Jurdak, that is,
15 Miss Porter's report, on to Pat Bradley?

16 A Yes, I did.

17 Q Did you send him a copy or an original?

18 A I don't recall. I don't recall. I suspect
19 that I sent him the original, because I would
20 normally deal with my supervisors in that
21 way. If I had a piece of paper that was
22 important for whatever reason, I would
23 normally keep a copy myself and give my
24 superior the original. I don't specifically

1 come to your office at 3 o'clock and we'll
2 meet with Sheila and I'll bar her.

3 Q What happened next?

4 A At 3 o'clock, I went to the office, Donna's
5 office. Donna called Sheila in, and I
6 started my conversation by saying something
7 like, Sheila, I need to have a very
8 uncomfortable conversation with you this
9 afternoon. I said it has recently come to my
10 attention that you have divulged confidential
11 medical information with an outside agency
12 and as a result I'm going to have to bar you.
13 I said contract employees are held to the
14 same rules and regulations as county
15 employees.

16 I opened the policy, and I read one or
17 two paragraphs having to do with information
18 being given to outside agencies without
19 authorization. I read those paragraphs, and
20 then I asked is there anything that you'd
21 like to say in your defense or is there
22 anything that in any way would you like to
23 respond. Sheila was very upset, said no,
24 stood up and left the office.